

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Case No. 15-CR-30037-MGM
DEREK RICHARD,)	
)	
Defendant.)	

**GOVERNMENT’S OPPOSITION TO DEFENDANT’S
MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE**

The United States of America, by Rachael S. Rollins, United States Attorney for the District of Massachusetts, hereby submits its opposition to the Defendant’s Motion for Early Termination of Supervised Release. The Government opposes the defendant’s motion for the following reasons:

1. While the defendant has been in compliance with the terms of his supervised release for the approximately three and a half months since his release from confinement, he previously violated the terms of supervised release on numerous occasions, including the violation that resulting in his current six-month period of supervision. Continuing this period of supervision for the remaining approximately two and a half months will allow time to ensure the defendant continues his positive progress reintegrating into society and remaining drug free, with the support provided by his probation officer if necessary.
2. The defendant has not identified any particular hardship created by the terms of his supervised release.
3. The United States Probation Office has indicated to the Government that it cannot assent to the Defendant’s request for early termination of his supervised release.

Respectfully submitted,

RACHAEL S. ROLLINS
UNITED STATES ATTORNEY

/s/ Catherine G. Curley
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I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

By: /s/ Catherine G. Curley
CATHERINE G. CURLEY
Assistant United States Attorney

Date: March 28, 2023